# **Bay Area Air Quality Management District**

939 Ellis Street San Francisco, CA 94109 (415) 771-6000

# **Final**

# MAJOR FACILITY REVIEW PERMIT

Issued To:
Orcon Corporation
Facility # A1675

**Facility Address:** 1570 Atlantic Street Union City, CA 94587

Mailing Address: 1570 Atlantic Street Union City, CA 94587

Responsible Official Hollis Bascom President & CEO (510) 489-8100 Facility Contact Kesav Reddy Associate Engineer (510) 476-2174

**Type of Facility:** Manufacturing BAAQMD Permit Division Contact: **Primary SIC:** 3999 M.K. Carol Lee

**Product:** Aerospace Reinforced Film,

Adhesive Tapes and Products; Seaming Tape

# ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

| Signed by Ellen Garvey  | February 24, 2000 |
|---|-------------------|
| Ellen Garvey, Executive Officer/Air Pollution Control Officer | Date              |

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# I. STANDARD CONDITIONS

# A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 10/7/98);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 1/26/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 1/26/99); and

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 10/7/98).

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 1/26/99).

# B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

- 1. This Major Facility Review Permit was issued on November 1, 1999, and expires on October 31, 2004. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than April 30, 2004 and no earlier than October 31, 2003. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** October 31, 2004.. (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, 84.2)
- 2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
- 3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
- 4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
- 5. The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-

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# I. Standard Conditions

compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

- 7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
- 8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
- 9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B Public Information, Confidentiality of Business Information. (40 CFR Part 2)
- 10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

# C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

# **D.** Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

#### E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

## F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be November 1, 1999 to April 30, 2000.

# I. Standard Conditions

The report shall be submitted by May 31, 2000. Subsequent reports shall be for the following periods: May 1st through October 31th and November 1st through April 30th, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement Bay Area Air Quality Management District 939 Ellis Street San Francisco, CA 94109 Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

## **G.** Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be November 1st to October 31st. The certification shall be submitted by November 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division USEPA, Region IX 75 Hawthorne Street San Francisco, CA 94105 Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

# I. Standard Conditions

# H. Emergency Provisions

- 1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
- 2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit, which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
- 3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

## I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

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# II. EQUIPMENT

# **Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

| S#  | Description   | Make or Type          | Model     | Capacity      |
|-----|---|-----------------------|-----------|---------------|
| S1  | BOCS B (#1) Machine                                 | Allied Engineering    | N/A       | 250 RPM       |
| S2  | NPCS # 1 Oven (Natural Gas)                         | Gaspardo              | N/A       | 0.12 MMBTU/hr |
| S6  | BOCS (#3) Machine                                   | Allied Engineering    | N/A       | 250 RPM       |
| S7  | BOCS (#3) Oven (Natural Gas)                        | TK Associates         | N/A       | 0.8 MMBTU/hr  |
| S8  | Coater/Laminator Machine                            | Custom Design         | N/A       | N/A           |
| S9  | Coater/Laminator Oven (Natural Gas)                 | TK Associates         | N/A       | 0.5 MMBTU/hr  |
| S11 | Mix Room  | Custom Design         | N/A       | N/A           |
| S12 | Dry Adhesive Blending and<br>Conveying System       | Custom Design         | N/A       | N/A           |
| S13 | Combined Printing Operation                         | Pannier Printers (24) | # 7191 CD | N/A           |
| S19 | Cold Cleaner  | Gray Mills            | E200      | 15 Gallon     |
| S21 | Cold Cleaner  | Safety Kleen          | 17.4C     | 10 Gallon     |
| S22 | Cold Cleaner  | Safety Kleen          | 11        | 6 Gallon      |
| S25 | BOCS Adhesive Applicator<br>with Oven (Natural Gas) | Custom Design         | N/A       | 1 MMBTU/hr    |
| S26 | Coater Dryer (Natural Gas)                          | Custom Design         | N/A       | 1 MMBTU/hr    |

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# II. Equipment

**Table II B - Abatement Devices** 

|            |                          | Source(s)  | Applicable  | Operating  | Limit or              |
|------------|--------------------------|------------|-------------|------------|-----------------------|
| <b>A</b> # | Description              | Controlled | Requirement | Parameters | Efficiency            |
| A1         | Cartridge Dust Collector | S12        | 6-301       |            | Ringelman             |
|            |                          |            |             |            | n No. 1               |
| A1         | Cartridge Dust Collector | S12        | 6-310       |            | 0.15 gr/dscf          |
| A1         | Cartridge Dust Collector | S12        | 6-311       |            | 4.10P <sup>0.67</sup> |
|            |                          |            |             |            | lb/hr,                |
|            |                          |            |             |            | where P is            |
|            |                          |            |             |            | process               |
|            |                          |            |             |            | weight,               |
|            |                          |            |             |            | ton/hr                |
| A2         | Cartridge Dust Collector | S12        | 6-301       |            | Ringelman             |
|            |                          |            |             |            | n No. 1               |
| A2         | Cartridge Dust Collector | S12        | 6-310       |            | 0.15 gr/dscf          |
| A2         | Cartridge Dust Collector | S12        | 6-311       |            | 4.10P <sup>0.67</sup> |
|            |                          |            |             |            | lb/hr,                |
|            |                          |            |             |            | where P is            |
|            |                          |            |             |            | process               |
|            |                          |            |             |            | weight,               |
|            |                          |            |             |            | ton/hr                |

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# III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

- 1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
- Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

## **NOTE:**

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with <u>both</u> versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

Table III
Generally Applicable Requirements

|                     |   | Federally   |
|---------------------|---|-------------|
| Applicable          | Regulation Title or                                 | Enforceable |
| Requirement         | Description of Requirement                          | (Y/N)       |
| BAAQMD Regulation 1 | General Provisions and Definitions (10/07/98)       | N           |
| SIP Regulation 1    | General Provisions and Definitions (8/27/99)        | Y           |
| BAAQMD Regulation 4 | Air Pollution Episode Plan (3/20/91)                | N           |
| SIP Regulation 4    | Air Pollution Episode Plan (8/06/90)                | Y           |
| BAAQMD Regulation 5 | Open Burning (11/2/94)                              | N           |
| BAAQMD Regulation 6 | Particulate Matter and Visible Emissions (12/19/90) | N           |
| BAAQMD Regulation 7 | Odorous Substances (3/17/82)                        | N           |

# **III.** Generally Applicable Requirements

# Table III Generally Applicable Requirements

| Applicable<br>Requirement    | Regulation Title or  Description of Requirement  | Federally<br>Enforceable<br>(Y/N) |
|------------------------------|--|-----------------------------------|
| BAAQMD Regulation 8, Rule 1  | Organic Compounds - General Provisions (6/15/94)   | Y                                 |
| BAAQMD Regulation 8, Rule 3  | Organic Compounds - Architectural Coatings (12/20/95)  | Y                                 |
| BAAQMD Regulation 8, Rule 49 | Organic Compounds - Aerosol Paint Products (12/20/95)  | N                                 |
| SIP Regulation 8, Rule 49    | Organic Compounds - Aerosol Paint Products (3/22/95)   | Y                                 |
| BAAQMD Regulation 8, Rule 51 | Organic Compounds - Adhesive and Sealant<br>Products (12/20/95)  | N                                 |
| BAAQMD Regulation 11, Rule 2 | Hazardous Pollutants - Asbestos Demolition,<br>Renovation and Manufacturing (12/4/91)                                | Y                                 |
| BAAQMD Regulation 12, Rule   | Miscellaneous Standards of Performance -<br>Sandblasting (7/11/90)   | Y                                 |
| EPA Regulation 40 CFR 82     | Protection of Stratospheric Ozone (2/21/95)  |                                   |
| Subpart F, 40 CFR 82.106     | Containers Containing Class I or Class II Substance and Products Containing or Manufactured with a Class I Substance | Y                                 |
| Subpart F, 40 CFR 82.108     | Warning Statements   | Y                                 |
| Subpart F, 40 CFR 82.110     | Labels   | Y                                 |
| Subpart F, 40 CFR 82.112     | Modification, Removal, or Interference with Warning Statements   | Y                                 |

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# IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

- 1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
- 2 Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S1 - BOCS B (#1) MACHINE
S2 - NPCS #1 OVEN
S6 - BOCS (#3) MACHINE
S7 - BOCS #3 OVEN
S8 - COATER/LAMINATION MACHINE
S9 - COATER/LAMINATOR OVEN

|               |   | Federally   | Future    |
|---------------|---|-------------|-----------|
| Applicable    | Regulation Title or                                 | Enforceable | Effective |
| Requirement   | Description of Requirement                          | (Y/N)       | Date      |
| BAAQMD        | Organic Compounds - Paper, Fabric, and Film Coating |             |           |
| Regulation 8, | (12/20/95)  |             |           |
| Rule 12       |   |             |           |
| 8-12-301      | Limitations, Coating Lines                          | Y           |           |
| 8-12-301.1    | Low-Solvent Coating or Adhesive                     | Y           |           |
| 8-12-302      | Storage and Mixing Operations                       | Y           |           |
| 8-12-304      | Compliance Statement Requirement                    | Y           |           |
| 8-12-305      | Surface Preparation and Cleanup Solvent             | Y           |           |
| 8-12-501      | Coating Records                                     | Y           |           |
| 8-12-501.1    | Current list of coatings and Relevant Properties    | Y           |           |

# IV. Source-specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S1 - BOCS B (#1) MACHINE
S2 - NPCS #1 OVEN
S6 - BOCS (#3) MACHINE
S7 - BOCS #3 OVEN
S8 - COATER/LAMINATION MACHINE
S9 - COATER/LAMINATOR OVEN

| Applicable<br>Requirement     | Regulation Title or  Description of Requirement | Federally<br>Enforceable<br>(Y/N) | Future<br>Effective<br>Date |
|-------------------------------|---|-----------------------------------|-----------------------------|
| 8-12-501.2                    | Daily usage                                     | Y                                 |                             |
| 8-12-501.4                    | Record retention                                | Y                                 |                             |
| BAAQMD<br>Condition #<br>2704 |   |                                   |                             |
| Part 1                        | Usage (basis: Cumulative Increase)              | N                                 |                             |
| Part 2                        | Usage (basis: Cumulative Increase)              | Y                                 |                             |
| Part 3a                       | Usage (basis: Cumulative Increase)              | Y                                 |                             |
| Part 3b                       | Usage (basis: Toxics Risk Screen)               | N                                 |                             |
| Part 4                        | Usage (basis: Cumulative Increase)              | N                                 |                             |
| Part 5                        | Records (basis: Cumulative Increase)            | Y                                 |                             |
| Part 6                        | Records (basis: Cumulative Increase)            |                                   |                             |
| Part 6a                       | POC emissions                                   | Y                                 |                             |
| Part 6b                       | NPOC emissions                                  | N                                 |                             |
| Part 6c                       | Yards of product                                | Y                                 |                             |
| Part 6d                       | POC and NPOC emissions                          | N                                 |                             |
| Part 6e                       | POC and NPOC emissions                          | N                                 |                             |

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# IV. Source-specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
\$11 - MIX ROOM

|             |   | Federally   | Future    |
|-------------|---|-------------|-----------|
| Applicable  | Regulation Title or   | Enforceable | Effective |
| Requirement | Description of Requirement                                  | (Y/N)       | Date      |
| BAAQMD      | Organic Compounds - Coating, Ink and Adhesive Manufacturing |             |           |
| Regulation  | (06/15/94)  |             |           |
| 8, Rule 35  |   |             |           |
| 8-35-301    | Portable and Stationary Mixing Operating Requirements       | Y           |           |
| 8-35-303    | Equipment Cleaning  | Y           |           |
| 8-35-320    | Wipe Cleaning and Cleanup Solvent                           | Y           |           |

Table IV – C
Source-specific Applicable Requirements
S12 - DRY ADHESIVE BLENDING AND CONVEYING SYSTEM

| Applicable   | Regulation Title or                                   | Federally<br>Enforceable | Future<br>Effective |
|--------------|---|--------------------------|---------------------|
| Requirement  | Description of Requirement                            | (Y <sup>1</sup> /N)      | Date                |
| BAAQMD       | Particulate Matter and Visible Emissions (12/19/90)   |                          |                     |
| Regulation 6 |   |                          |                     |
| 6-301        | Ringelmann No. 1 Limitation                           | Y                        |                     |
| 6-305        | Visible Particles                                     | Y                        |                     |
| 6-310        | Particulate Weight Limitation                         | Y                        |                     |
| 6-311        | Process Weight Rate                                   | Y                        |                     |
| BAAQMD       |   |                          |                     |
| Condition #  |   |                          |                     |
| 14770        |   |                          |                     |
| Part 1       | Usage (basis: Cumulative Increase)                    | Y                        |                     |
| Part 2       | Abatement (basis: Cumulative Increase)                | Y                        |                     |
| Part 3       | Abatement (basis: Cumulative Increase)                | Y                        |                     |
| Part 4       | Ringelmann No. 1 Limitation (basis: Regulation 6-301) | Y                        |                     |
| Part 5       | Records (basis: Cumulative Increase)                  | Y                        |                     |
| Part 6       | Monitoring (basis: Regulation 2-1-403)                | Y                        |                     |
| Part 7       | Records (basis: Regulation 1-441)                     | Y                        |                     |

IV. Source-specific Applicable Requirements

# Table IV - D Source-specific Applicable Requirements S13 – COMBINED PRINTING OPERATION

| Applicable  | Regulation Title or  | Federally<br>Enforceable | Future<br>Effective |
|-------------|--|--------------------------|---------------------|
| Requirement | Description of Requirement                                       | (Y <sup>1</sup> /N)      | Date                |
| BAAQMD      | Description of Requirement                                       | (1714)                   | Date                |
| Regulation  | Organic Compounds - General Solvent and Surface Coating          |                          |                     |
| 8, Rule 4   | Operations (5/15/96)   |                          |                     |
| 8-4-302     | Limitation on Solvents and Surface Coatings                      |                          |                     |
| 8-4-302.1   | Annual VOC Emission Limit or 8-4-302.3                           | N                        |                     |
| 8-4-302.3   | Coating VOC Content Limit or 8-4-302.1                           | N                        |                     |
| 8-4-312     | Solvent Evaporative Loss Minimization                            | Y                        |                     |
| 8-4-501     | Recordkeeping Requirements                                       | Y                        |                     |
| 8-4-502     | Burden of Proof  | N                        |                     |
| SIP         | PROVISIONS NO LONGER IN CURRENT RULE                             |                          |                     |
| Regulation  | Organic Compounds - General Solvent and Surface Coating          |                          |                     |
| 8, Rule 4   | Operations (12/20/95)  |                          |                     |
| 8-4-301     | Limitations on Operations Involving Heat                         | $Y^{l}$                  |                     |
| 8-4-304     | Alternate Compliance   | $Y^{l}$                  |                     |
| 8-4-310     | Limits on Container Size for Non-Industrial User                 | $Y^{l}$                  |                     |
| 8-4-311     | Limits on Sale of Non-Complying Solvents and Surface Coatings    | $Y^1$                    |                     |
| BAAQMD      |  |                          |                     |
| Regulation  | Organic Compounds – Graphic Arts Printing and Coating            |                          |                     |
| 8, Rule 20  | Operations (3/3/99)  |                          |                     |
| 8-20-110    | Exemption, Small User  | N                        |                     |
| 8-20-507    | Burden of Proof  | Y                        |                     |
| SIP         | PROVISIONS NO LONGER IN CURRENT RULE                             |                          |                     |
| Regulation  | Organic Compounds – Graphic Arts Printing and Coating            |                          |                     |
| 8, Rule 20  | <b>Operations</b> (12/23/97)                                     |                          |                     |
| 8-20-110    | Exemption, Small User  | $Y^1$                    |                     |
| BAAQMD      |  |                          |                     |
| Condition # |  |                          |                     |
| 8025        |  |                          |                     |
| Part 1      | POC Emission Limit (basis: Cumulative Increase; Regulation 8-20- | Y                        |                     |
|             | 110)   |                          |                     |

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# IV. Source-specific Applicable Requirements

# Table IV - D Source-specific Applicable Requirements S13 – COMBINED PRINTING OPERATION

|             |                                      | Federally           | Future    |
|-------------|--------------------------------------|---------------------|-----------|
| Applicable  | Regulation Title or                  | Enforceable         | Effective |
| Requirement | Description of Requirement           | (Y <sup>1</sup> /N) | Date      |
| Part 2      | Records (basis: Cumulative Increase) | Y                   |           |

Table IV - E Source-specific Applicable Requirements S19 - COLD CLEANER

|              |   | Federally           | Future    |
|--------------|---|---------------------|-----------|
| Applicable   | Regulation Title or   | Enforceable         | Effective |
| Requirement  | Description of Requirement                                  | (Y <sup>1</sup> /N) | Date      |
| BAAQMD       |   |                     |           |
| Regulation   | Organic Compounds - Solvent Cleaning Operations             |                     |           |
| 8, Rule 16   |   |                     |           |
| 8-16-303     | Cold Cleaner Requirements                                   | N                   |           |
| 8-16-303.1   | General Operating Requirements                              | Y                   |           |
| 8-16-303.1.1 | Proper Operation and Maintenance                            | Y                   |           |
| 8-16-303.1.2 | Leak Repair Requirement                                     | Y                   |           |
| 8-16-303.1.3 | Prevention of Evaporation of Solvent                        | Y                   |           |
| 8-16-303.1.4 | Waste Solvent   | Y                   |           |
| 8-16-303.1.5 | Solvent Covers/Remote Reservoirs                            | Y                   |           |
| 8-16-303.1.6 | Solvent Spray   | N                   |           |
| 8-16-303.2   | Cold Cleaner Operating Requirements                         | Y                   |           |
| 8-16-303.3   | Cold Cleaner General Equipment Requirements                 | Y                   |           |
| 8-16-303.4   | Cold Cleaner Control Devices                                | Y                   |           |
| 8-16-303.5   | Multiple Cold Cleaner Requirements                          | N                   |           |
| 8-16-501     | Solvent Records   | N                   |           |
| 8-16-501.2   | Facility-wide, Annual Records of Make-up Solvent            | N                   |           |
| 8-16-501.3   | Annual Records of Solvent Subject to 8-16-111               | N                   |           |
| 8-16-501.5   | Records Made Available to APCO                              | N                   |           |
| 8-16-501.6   | Other Information (i.e., Purchase Orders or Hazardous Waste | N                   |           |
|              | Manifests)  |                     |           |

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# IV. Source-specific Applicable Requirements

# Table IV - E Source-specific Applicable Requirements S19 - COLD CLEANER

| Applicable<br>Requirement<br>SIP | Regulation Title or Description of Requirement PROVISIONS NO LONGER IN CURRENT RULE | Federally<br>Enforceable<br>(Y¹/N) | Future<br>Effective<br>Date |
|----------------------------------|---|------------------------------------|-----------------------------|
| Regulation                       | Organic Compounds - Solvent Cleaning Operations (12/09/94)                          |                                    |                             |
| 8, Rule 16<br>8-16-303           | Cold Cleaner Requirements   | Y <sup>1</sup>                     |                             |
| 8-16-303.1.6                     | Solvent Spray   | Y <sup>1</sup>                     |                             |
| 8-16-501                         | Solvent Records   | $Y^1$                              |                             |
| 8-16-501.2                       | All Other Solvents  | $Y^1$                              |                             |
| BAAQMD<br>Condition #<br>3242    |   |                                    |                             |
| Part 1                           | Usage (basis: Cumulative Increase)  | Y                                  |                             |
| Part 4                           | Records (basis: Cumulative Increase)  | Y                                  |                             |

Table IV - F
Source-specific Applicable Requirements
S21 - COLD CLEANER

| Applicable<br>Requirement          | Regulation Title or Description of Requirement  | Federally<br>Enforceable<br>(Y¹/N) | Future<br>Effective<br>Date |
|------------------------------------|---|------------------------------------|-----------------------------|
| BAAQMD<br>Regulation<br>8, Rule 16 | Organic Compounds - Solvent Cleaning Operations |                                    |                             |
| 8-16-303                           | Cold Cleaner Requirements                       | N                                  |                             |
| 8-16-303.1                         | General Operating Requirements                  | Y                                  |                             |
| 8-16-303.1.1                       | Proper Operation and Maintenance                | Y                                  |                             |
| 8-16-303.1.2                       | Leak Repair Requirement                         | Y                                  |                             |
| 8-16-303.1.3                       | Prevention of Evaporation of Solvent            | Y                                  |                             |
| 8-16-303.1.4                       | Waste Solvent                                   | Y                                  |                             |
| 8-16-303.1.5                       | Solvent Covers/Remote Reservoirs                | Y                                  |                             |
| 8-16-303.1.6                       | Solvent Spray                                   | N                                  |                             |
| 8-16-303.2                         | Cold Cleaner Operating Requirements             | Y                                  |                             |

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# IV. Source-specific Applicable Requirements

# Table IV - F Source-specific Applicable Requirements S21 - COLD CLEANER

| Applicable   | Regulation Title or   | Federally<br>Enforceable | Future<br>Effective |
|--------------|---|--------------------------|---------------------|
| Requirement  | Description of Requirement                                  | (Y¹/N)                   | Date                |
| 8-16-303.3   | Cold Cleaner General Equipment Requirements                 | Y                        | Dute                |
| 8-16-303.4   | Cold Cleaner Control Devices                                | Y                        |                     |
| 8-16-303.5   | Multiple Cold Cleaner Requirements                          | N                        |                     |
| 8-16-501     | Solvent Records   | N                        |                     |
| 8-16-501.2   | Facility-wide, Annual Records of Make-up Solvent            | N                        |                     |
| 8-16-501.3   | Annual Records of Solvent Subject to 8-16-111               | N                        |                     |
| 8-16-501.5   | Records Made Available to APCO                              | N                        |                     |
| 8-16-501.6   | Other Information (i.e., Purchase Orders or Hazardous Waste | N                        |                     |
|              | Manifests)  |                          |                     |
| SIP          | PROVISIONS NO LONGER IN CURRENT RULE                        |                          |                     |
| Regulation   | Organic Compounds - Solvent Cleaning Operations (12/09/94)  |                          |                     |
| 8, Rule 16   |   |                          |                     |
| 8-16-303     | Cold Cleaner Requirements                                   | $\mathbf{Y}^{1}$         |                     |
| 8-16-303.1.6 | Solvent Spray   | $\mathbf{Y}^{1}$         |                     |
| 8-16-501     | Solvent Records   | $\mathbf{Y}^{1}$         |                     |
| 8-16-501.2   | All Other Solvents  | $\mathbf{Y}^{1}$         |                     |
| BAAQMD       |   |                          |                     |
| Condition #  |   |                          |                     |
| 3242         |   |                          |                     |
| Part 2       | Usage (basis: Cumulative Increase)                          | Y                        |                     |
| Part 4       | Records (basis: Cumulative Increase)                        | Y                        |                     |

Table IV - G Source-specific Applicable Requirements S22 - COLD CLEANER

|             |                            | Federally           | Future    |
|-------------|----------------------------|---------------------|-----------|
| Applicable  | Regulation Title or        | Enforceable         | Effective |
| Requirement | Description of Requirement | (Y <sup>1</sup> /N) | Date      |

# IV. Source-specific Applicable Requirements

# Table IV - G Source-specific Applicable Requirements S22 - COLD CLEANER

|              |  | Federally           | Future    |
|--------------|--|---------------------|-----------|
| Applicable   | Regulation Title or  | Enforceable         | Effective |
| Requirement  | Description of Requirement   | (Y <sup>1</sup> /N) | Date      |
| BAAQMD       |  |                     |           |
| Regulation   | Organic Compounds - Solvent Cleaning Operations                        |                     |           |
| 8, Rule 16   |  |                     |           |
| 8-16-303     | Cold Cleaner Requirements  | N                   |           |
| 8-16-303.1   | General Operating Requirements   | Y                   |           |
| 8-16-303.1.1 | Proper Operation and Maintenance                                       | Y                   |           |
| 8-16-303.1.2 | Leak Repair Requirement  | Y                   |           |
| 8-16-303.1.3 | Prevention of Evaporation of Solvent                                   | Y                   |           |
| 8-16-303.1.4 | Waste Solvent  | Y                   |           |
| 8-16-303.1.5 | Solvent Covers/Remote Reservoirs                                       | Y                   |           |
| 8-16-303.1.6 | Solvent Spray  | N                   |           |
| 8-16-303.2   | Cold Cleaner Operating Requirements                                    | Y                   |           |
| 8-16-303.3   | Cold Cleaner General Equipment Requirements                            | Y                   |           |
| 8-16-303.4   | Cold Cleaner Control Devices   | Y                   |           |
| 8-16-303.5   | Multiple Cold Cleaner Requirements                                     | N                   |           |
| 8-16-501     | Solvent Records  | N                   |           |
| 8-16-501.2   | Facility-wide, Annual Records of Make-up Solvent                       | N                   |           |
| 8-16-501.3   | Annual Records of Solvent Subject to 8-16-111                          | N                   |           |
| 8-16-501.5   | Records Made Available to APCO   | N                   |           |
| 8-16-501.6   | Other Information (i.e., Purchase Orders or Hazardous Waste Manifests) | N                   |           |
| SIP          | PROVISIONS NO LONGER IN CURRENT RULE                                   |                     |           |
| Regulation   | Organic Compounds - Solvent Cleaning Operations (12/09/94)             |                     |           |
| 8, Rule 16   |  |                     |           |
| 8-16-303     | Cold Cleaner Requirements  | $\mathbf{Y}^{1}$    |           |
| 8-16-303.1.6 | Solvent Spray  | $\mathbf{Y}^{1}$    |           |
| 8-16-501     | Solvent Records  | Y <sup>1</sup>      |           |
| 8-16-501.2   | All Other Solvents   | Y <sup>1</sup>      |           |
| BAAQMD       |  |                     |           |
| Condition #  |  |                     |           |
| 3242         |  |                     |           |
| Part 3       | Usage (basis: Cumulative Increase)                                     | Y                   |           |
| Part 4       | Records (basis: Cumulative Increase)                                   | Y                   |           |

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# IV. Source-specific Applicable Requirements

Table IV - H
Source-specific Applicable Requirements
S25 - BOCS ADHESIVE APPLICATOR WITH OVEN

| Applicable  | Regulation Title or  | Federally<br>Enforceable | Future<br>Effective |
|-------------|--|--------------------------|---------------------|
| Requirement | Description of Requirement                                     | (Y <sup>1</sup> /N)      | Date                |
| BAAQMD      | Organic Compounds - Paper, Fabric, and Film Coating (12/20/95) |                          |                     |
| Regulation  |  |                          |                     |
| 8, Rule 12  |  |                          |                     |
| 8-12-301    | Limitations, Coating Lines                                     | Y                        |                     |
| 8-12-301.1  | Low-Solvent Coating or Adhesive                                | Y                        |                     |
| 8-12-302    | Storage and Mixing Operations                                  | Y                        |                     |
| 8-12-304    | Compliance Statement Requirement                               | Y                        |                     |
| 8-12-305    | Surface Preparation and Cleanup Solvent                        | Y                        |                     |
| 8-12-501    | Coating Records  | Y                        |                     |
| BAAQMD      |  |                          |                     |
| Condition # |  |                          |                     |
| 15268       |  |                          |                     |
| Part 1      | Usage (basis Cumulative Increase)                              | Y                        |                     |
| Part 2      | Usage (basis: Cumulative Increase)                             | Y                        |                     |
| Part 3      | Records (basis: Cumulative Increase)                           | Y                        |                     |

Table IV - I Source-specific Applicable Requirements S26 - COATER DRYER

| Applicable<br>Requiremen<br>t | Regulation Title or Description of Requirement      | Federally<br>Enforceable<br>(Y¹/N) | Future<br>Effective<br>Date |
|-------------------------------|---|------------------------------------|-----------------------------|
| BAAQMD                        | Organic Compounds - Paper, Fabric, and Film Coating |                                    |                             |
| Regulation                    | (12/20/95)  |                                    |                             |
| 8, Rule 12                    |   |                                    |                             |
| 8-12-301                      | Limitations, Coating Lines                          | Y                                  |                             |
| 8-12-301.1                    | Low-Solvent Coating or Adhesive                     | Y                                  |                             |

# IV. Source-specific Applicable Requirements

# Table IV - I Source-specific Applicable Requirements S26 - COATER DRYER

| Applicable<br>Requiremen<br>t  | Regulation Title or Description of Requirement | Federally<br>Enforceable<br>(Y¹/N) | Future<br>Effective<br>Date |
|--------------------------------|--|------------------------------------|-----------------------------|
| 8-12-302                       | Storage and Mixing Operations                  | Y                                  |                             |
| 8-12-304                       | Compliance Statement Requirement               | Y                                  |                             |
| 8-12-305                       | Surface Preparation and Cleanup Solvent        | Y                                  |                             |
| 8-12-501                       | Coating Records                                | Y                                  |                             |
| BAAQMD<br>Condition #<br>15437 |  |                                    |                             |
| Part 1                         | Usage (basis Cumulative Increase)              | Y                                  |                             |
| Part 2                         | Usage (basis: Cumulative Increase)             | Y                                  |                             |
| Part 3                         | Records (basis: Cumulative Increase)           | Y                                  |                             |

<sup>&</sup>lt;sup>1</sup> This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

# V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

# VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

## Condition #2704

For S1, BOCS B (#1) Machine

- S2, NPCS #1 Oven
- S6, BOCS (#3) Machine
- S7, BOCS #3 Oven
- S8, Coater/Laminator Machine
- S9, Coater/Laminator Oven
- \*1. Emissions of Non-Precursor Organic Compounds from S1, S2, S6, and S7 combined shall not exceed 100,000 pounds (50 tons) per calendar year. Any exceedance of this limit may subject Orcon to New Source Review as if this equipment had not been installed and operated. (basis: Cumulative Increase)
- 2. Emissions of Precursor Organic Compounds from S1, S2, S6, S7, and S9 combined shall not exceed 220 pounds in any one day or 48,000 pounds (24 tons) per calendar year. Any exceedance of these limits may subject Orcon to New Source Review as if this equipment had not been installed and operated. (basis: Cumulative Increase)
- 3a. Emissions of Precursor Organic Compounds from S8 and S9 shall not exceed 14 pounds in any one day. (basis: Cumulative Increase)
- \*3b. Methylene chloride shall not be used as a clean-up solvent at S8 and S9. (basis: Toxic Risk Screen)
- \*4. Emissions of Volatile Organic Compounds (Precursor Organic Compounds and Non-Precursor Organic Compounds combined) from S1, S2, S6, S7 combined shall not exceed 0.08 pound per yard of product produced when averaged over a calendar quarter. The emission rate will be calculated on a weekly basis and summarized quarterly. (basis: Cumulative Increase)

# VI. Permit Conditions

# Condition #2704

For S1, BOCS B (#1) Machine

- S2, NPCS #1 Oven
- S6, BOCS (#3) Machine
- S7, BOCS #3 Oven
- S8, Coater/Laminator Machine
- S9, Coater/Laminator Oven
- 5. District approved solvent usage logs shall be maintained that list the mass emissions of Precursor Organic Compounds and Non-Precursor Organic Compounds from each of S1, S6, and S8 on a daily and year-to-date basis. Solvent emissions from ovens S2, S7, and S9 shall be grouped with emissions from the coaters associated with each such oven for the purpose of these records. These logs shall be summarized on a quarterly basis and year-to-date basis. These logs shall be retained for at least five years and be available for review during normal business hours by the District's representatives. (basis: Cumulative Increase; Regulation 2-6-501)
- 6. A quarterly emissions report for S1, S6, and S8 shall be submitted to the Enforcement Division and Permit Services Division within 30 days of the end of each quarter. Solvent emissions from ovens S2, S7, and S9 shall be grouped with emissions from the coaters associated with each such oven for the purpose of these records. These reports shall demonstrate compliance with Conditions 1, 2, 3, 4, and 5 above by listing the following: (basis: Cumulative Increase; Regulation 2-6-501)
  - a) emissions of POC in lb/day, lb/week, lb/quarter and year-to-date emission;
  - \*b) emissions of NPOC in lb/day, lb/week, lb/quarter and year-to-date emission;
  - c) total yards of product produced for each BOCS line (S1 and S6) on a weekly basis during the quarter;
  - \*d) emissions of VOC (POC and NPOC combined) in lb/yd of BOCS product averaged on a weekly basis; and
  - \*e) emissions of VOC (POC and NPOC combined) in lb/yd of BOCS product averaged over the calendar quarter.

# **VI. Permit Conditions**

#### Condition # 3242

For S19, Cold Cleaner S21, Cold Cleaner S22, Cold Cleaner

- 1. The make-up solvent usage at S19 shall not exceed 15 gallons per any consecutive twelve-month period. (basis: Cumulative Increase)
- 2. The make-up solvent usage at S21 shall not exceed 40 gallons per any consecutive twelve-month period. (basis: Cumulative Increase)
- 3. The make-up solvent usage at S22 shall not exceed 15 gallons per any consecutive twelve-month period. (basis: Cumulative Increase)
- 4. The type and amount of make-up solvent used at each source (S19, S21, and S22) shall be recorded in a log on a quarterly basis. Such records shall be kept on site for five years from the date of entry and made available to District staff upon request. (basis: Cumulative Increase; Regulation 2-6-501)

#### **Condition # 8025**

For S13, Combined Printing Operation

- 1. The precursor organic compound (POC) emissions from S13 shall not exceed 175 pounds per month or 2,100 pounds per year. (basis: Cumulative Increase; Regulation 8-20-110)
- 2. In order to demonstrate compliance with the above conditions, the following records shall be maintained in a District approved log. These records shall be kept on site and made available for District inspection for a period of five years from the date on which a record is made.
  - a. The type, VOC content, and amount of each ink used monthly.
  - b. Calculated POC emissions.
  - c. Monthly ink usage and POC emissions shall be totaled for each consecutive 12-month period.

(basis: Cumulative Increase; Regulation 2-6-501)

# VI. Permit Conditions

#### **Condition #14770**

For S12, Dry Adhesive Blending and Conveying System

- 1. The total throughput of material processed shall not exceed 12 tons in any day. (basis: Cumulative Increase)
- 2. S12 shall be abated by A1 and A2 dust collector at all times during its operation. (basis: Cumulative Increase)
- 3. A1 and A2 shall be kept in good operating condition at all times. (basis: Cumulative Increase)
- 4. Visible dust emissions from the operation of S12 shall not exceed Ringelmann 1.0 or result in fallout on adjacent property in such quantities as to cause a public nuisance per Regulation 1-301. (basis: Regulation 6-301)
- 5. A daily record of the total weight of material processed shall be entered in a District approved log and retained for a period of at least five years from the date of entry. These logs shall be kept on site and made available to the District staff upon request. (basis: Cumulative Increase)
- 6. The A1 and A2 dust collector shall be inspected at a minimum of every five (5) days of operation to ensure proper operation. The following items shall be checked:
  - a. The dust collector exhaust shall be checked for evidence of particulate breakthrough. If breakthrough is evident from plume observations, or dust buildup near the stack outlet, the filter bags shall be checked for improper installation or any tears, holes, abrasions, and scuffs, and replaced as needed.
  - b. All hoppers shall be discharged in a timely manner.
  - c. The shaker cleaning system shall be maintained and operated to ensure proper collection per the manufacturer's instructions.

(basis: Regulation 2-6-501)

- 7. In order to demonstrate compliance with Condition 6, the following records shall be maintained in a District approved log. These records shall be kept on site and made available for District inspection for a period of at least five years from the date on which a record is made.
  - a. Records of all inspections and all maintenance work including bag replacement for the baghouse. Records of each inspection shall consist of a log containing the date of inspection and the initials of the personnel that inspects the baghouses. (basis: Regulation 2-6-501)

# VI. Permit Conditions

#### **Condition # 15268**

For S25, BOCS Adhesive Applicator with Oven

- 1. Usage of adhesive and coating and cleanup solvent at S25 shall not exceed the following limits, in any consecutive twelve-month period:
  - a. Comp. Urethane Adhesive, or Sancure Waterborne Urethane

23,600 gallons 0 gallons

b. Cleanup Solvent(basis: Cumulative Increase, Toxic Risk Screen)

- 2. Coatings and cleanup solvents other than the materials specified in Condition 1 and/or other quantities than those specified may be used at S25, provided that the owner/operator can demonstrate that both of the following are satisfied:
  - a. Total POC emissions from S25, do not exceed 7,001 pounds in any consecutive twelve month period; and
  - b. The use of these materials does not increase toxic emissions above any risk screening trigger level.

(basis: Cumulative Increase, Toxic Risk Screen)

- 3. In order to demonstrate compliance with Conditions 1 and 2, the following records shall be kept by the owner/operator of S25. Such records should be kept for a minimum of 5 years from the date of record and be made available for inspection upon request by the District.
  - a. Type and monthly usage of all POC containing materials used;
  - b. If a material and/or quantity other than those specified in Condition 1 are used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Condition 2, on a monthly basis;
  - c. Monthly usage and/or calculated emissions shall be totaled for each consecutive twelve-month period.

(basis: Cumulative Increase, Toxic Risk Screen, Regulation 2-6-501)

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# VI. Permit Conditions

#### **Condition # 15437**

For S26, Coater Dryer

1. Usage of adhesive coating and cleanup solvents at S26 shall not exceed the following limits, in any consecutive twelve-month period:

a. Orcon #OA-66 & equivalents or Orcon # OA-1036 & equivalents

27,331 gallons total (excluding water)

b. Cleanup Solvent

0 gallons

(basis: Cumulative Increase, Toxic Risk Screen)

- 2. Coatings and cleanup solvents other than the materials specified in Condition 1 and/or other quantities than those specified may be used at S26, provided that the owner/operator can demonstrate that both of the following are satisfied:
  - a. Total POC emissions from \$26, do not exceed 6,833 pounds in any consecutive twelve month period; and
  - b. The use of these materials does not increase toxic emissions above any risk screening trigger level.

(basis: Cumulative Increase, Toxic Risk Screen)

- 3. In order to demonstrate compliance with Conditions 1 and 2, the following records shall be kept by the owner/operator of S23. Such records should be kept for a minimum of 5 years from the date of record and be made available for inspection upon request by the District.
  - a. Type and monthly usage of all POC containing materials used (excluding water);
  - b. If a material and/or quantity other than those specified in Condition 1 are used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Condition 2, on a monthly basis;
  - c. Monthly usage and/or calculated emissions shall be totaled for each consecutive twelve-month period.

(basis: Cumulative Increase, Toxic Risk Screen, Regulation 2-6-501)

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# VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

# Table VII - A Applicable Limits and Compliance Monitoring Requirements S1 - BOCS B (#1) MACHINE S2 - NPCS #1 OVEN S6 - BOCS (#3) MACHINE S7 - BOCS #3 OVEN S8 - COATER/LAMINATION MACHINE S9 - COATER/LAMINATOR OVEN

| Type of | Emission Limit Citation                     | FE<br>Y/N | Future<br>Effective<br>Date | Emission Limit  | Monitoring Requirement Citation                                    | Monitoring<br>Frequency<br>(P/C/N) | Monitoring<br>Type |
|---------|---|-----------|-----------------------------|---|--|------------------------------------|--------------------|
| VOC     | BAAQMD<br>8-12-301.1                        | Y         |                             | Coating < 2.2 lb/gal  | Regulation<br>8-12-501   | P/D                                | Records            |
|         | BAAQMD<br>Condition<br>#<br>2704<br>Part 2  | Y         |                             | $POC \le 220 \text{ lb/day or}$<br>$POC \le 24 \text{ TPY}$<br>(from S1, S2, S6, S7, and S9 combined) | Regulation<br>8-12-501;<br>BAAQMD<br>Condition #2704<br>Part 5 & 6 | P/D                                | Records            |
|         | BAAQMD<br>Condition<br>#<br>2704<br>Part 3a | Y         |                             | POC ≤ 14 lb/day and<br>(from S8 and S9<br>combined)   | Regulation<br>8-12-501;<br>BAAQMD<br>Condition #2704<br>Part 5 & 6 | P/D                                | Records            |

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# VII. Applicable Emission Limits & Compliance Monitoring Requirements

# Table VII - A Applicable Limits and Compliance Monitoring Requirements S1 - BOCS B (#1) MACHINE S2 - NPCS #1 OVEN S6 - BOCS (#3) MACHINE S7 - BOCS #3 OVEN S8 - COATER/LAMINATION MACHINE

S9 - COATER/LAMINATOR OVEN

| T             | Emission          | DD.       | Future            |                           | Monitoring              | Monitoring           | No. of Assistance  |
|---------------|-------------------|-----------|-------------------|---------------------------|-------------------------|----------------------|--------------------|
| Type of limit | Limit<br>Citation | FE<br>Y/N | Effective<br>Date | Emission Limit            | Requirement<br>Citation | Frequency<br>(P/C/N) | Monitoring<br>Type |
|               |                   |           | Date              |                           |                         |                      |                    |
| NPOC &        | BAAQMD            | N         |                   | NPOC + POC                | Regulation              | P/D                  | Records            |
| POC           | Condition         |           |                   | $\leq 0.08$ lb/yard of    | 8-12-501;               |                      |                    |
|               | #                 |           |                   | product                   | BAAQMD                  |                      |                    |
|               | 2704              |           |                   |                           | Condition #             |                      |                    |
|               | Part 4            |           |                   |                           | 2704 Part 5 & 6         |                      |                    |
| NPOC          | BAAQMD            | N         |                   | No methylene chloride     | Regulation              | P/D                  | Records            |
|               | Condition         |           |                   | usage for cleanup at S8   | 8-12-501;               |                      |                    |
|               | #                 |           |                   | and S9                    | BAAQMD                  |                      |                    |
|               | 2704              |           |                   |                           | Condition #             |                      |                    |
|               | Part 3b           |           |                   |                           | 2704 Part 5 & 6         |                      |                    |
|               | BAAQMD            | N         |                   | NPOC ≤ 50 TPY             | Regulation              | P/D                  | Records            |
|               | Condition         |           |                   | (from S1, S2, S6, S7, and | 8-12-501;               |                      |                    |
|               | #                 |           |                   | S9 combined)              | BAAQMD                  |                      |                    |
|               | 2704              |           |                   |                           | Condition               |                      |                    |
|               | Part 1            |           |                   |                           | #2704                   |                      |                    |
|               |                   |           |                   |                           | Part 5 & 6              |                      |                    |

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# VII. Applicable Emission Limits & Compliance Monitoring Requirements

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S12 - DRY ADHESIVE BLENDING AND CONVEYING SYSTEM

| Type of | Emission<br>Limit | FE  | Future<br>Effectiv |                                      | Monitoring<br>Requirement | Monitoring<br>Frequency | Monitoring |
|---------|-------------------|-----|--------------------|--------------------------------------|---------------------------|-------------------------|------------|
| limit   | Citation          | Y/N | e Date             | Emission Limit                       | Citation                  | (P/C/N)                 | Type       |
| TSP     | Regulation        | Y   |                    | Ringelmann 1.0                       | BAAQMD                    | P/C Every 5             | Inspection |
|         | 6-301             |     |                    |                                      | Condition #               | days of                 | records    |
|         |                   |     |                    |                                      | 14770 Part 6-7            | operation               |            |
|         | Regulation        | Y   |                    | 0.15 gr/dscf                         | BAAQMD                    | P/C Every 5             | Inspection |
|         | 6-310             |     |                    |                                      | Condition #               | days of                 | records    |
|         |                   |     |                    |                                      | 14770 Part 6-7            | operation               |            |
|         | Regulation        | Y   |                    | 4.10P <sup>0.67</sup> lb/hr, where P | BAAQMD                    | P/C Every 5             | Inspection |
|         | 6-311             |     |                    | is process weight,                   | Condition #               | days of                 | records    |
|         |                   |     |                    | ton/hr                               | 14770 Part 6-7            | operation               |            |
|         | BAAQMD            | N   |                    | Throughput <u>&lt;</u> 12            | BAAQMD                    | P/D                     | Records    |
|         | Condition         |     |                    | tons/day                             | Condition #               |                         |            |
|         | #                 |     |                    |                                      | 14770 Part 5              |                         |            |
|         | 14770 Part        |     |                    |                                      |                           |                         |            |
|         | 1                 |     |                    |                                      |                           |                         |            |
|         | BAAQMD            | N   |                    | Ringelmann 1.0                       | BAAQMD                    | P/C Every 5             | Inspection |
|         | Condition         |     |                    |                                      | Condition #               | days of                 | records    |
|         | #                 |     |                    |                                      | 14770 Part 6-7            | operation               |            |
|         | 14770 Part        |     |                    |                                      |                           |                         |            |
|         | 4                 |     |                    |                                      |                           |                         |            |

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# VII. Applicable Emission Limits & Compliance Monitoring Requirements

 $\begin{tabular}{ll} Table\ VII\ -\ C\\ Applicable\ Limits\ and\ Compliance\ Monitoring\ Requirements\\ S13\ -\ COMBINED\ PRINTING\ OPERATION \end{tabular}$ 

| Type of | Emission<br>Limit | FE  | Future<br>Effective |                               | Monitoring<br>Requirement | Monitoring<br>Frequency | Monitoring |
|---------|-------------------|-----|---------------------|-------------------------------|---------------------------|-------------------------|------------|
| limit   | Citation          | Y/N | Date                | Emission Limit                | Citation                  | (P/C/N)                 | Type       |
| VOC     | BAAQMD            | Y   |                     | VOC ≤ 5 TPY                   | Regulation                | P/M                     | Records    |
|         | 8-4-302.1         |     |                     | or compliance with            | 8-4-501                   |                         |            |
|         |                   |     |                     | 8-4-302.3                     |                           |                         |            |
|         | BAAQMD            | Y   |                     | VOC ≤ 3.5 lb/gal or           | Regulation                | P/M                     | Records    |
|         | 8-4-302.3         |     |                     | compliance with               | 8-4-501                   |                         |            |
|         |                   |     |                     | 8-4-302.1                     |                           |                         |            |
|         | BAAQMD            | Y   |                     | POC ≤ 175 lb/mon              | Regulation                | P/M                     | Records    |
|         | Condition #       |     |                     | and                           | 8-20-507;                 |                         |            |
|         | 8025              |     |                     | $POC \le 2,100 \text{ lb/yr}$ | BAAQMD                    |                         |            |
|         | Part 1            |     |                     |                               | Condition #               |                         |            |
|         |                   |     |                     |                               | 8025 Part 2               |                         |            |

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S19 - COLD CLEANER

|         | Emission  |     | Future    |                       | Monitoring   | Monitoring |            |
|---------|-----------|-----|-----------|-----------------------|--------------|------------|------------|
| Type of | Limit     | FE  | Effective |                       | Requirement  | Frequency  | Monitoring |
| limit   | Citation  | Y/N | Date      | <b>Emission Limit</b> | Citation     | (P/C/N)    | Type       |
| VOC     | BAAQMD    | N   |           | Solvent < 15 gal/yr   | Regulation   | P/Q        | Records    |
|         | Condition |     |           |                       | 8-16-501;    |            |            |
|         | #3242     |     |           |                       | BAAQMD       |            |            |
|         | Part 1    |     |           |                       | Condition    |            |            |
|         |           |     |           |                       | #3242 Part 4 |            |            |

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# VII. Applicable Emission Limits & Compliance Monitoring Requirements

# $\begin{tabular}{ll} Table~VII-E\\ Applicable~Limits~and~Compliance~Monitoring~Requirements\\ S21-COLD~CLEANER\\ \end{tabular}$

|         | Emission  |     | Future    |                       | Monitoring  | Monitoring |            |
|---------|-----------|-----|-----------|-----------------------|-------------|------------|------------|
| Type of | Limit     | FE  | Effective |                       | Requirement | Frequency  | Monitoring |
| limit   | Citation  | Y/N | Date      | <b>Emission Limit</b> | Citation    | (P/C/N)    | Type       |
| VOC     | BAAQMD    | N   |           | Solvent < 40 gal/yr   | Regulation  | P/Q        | Records    |
|         | Condition |     |           |                       | 8-16-501;   |            |            |
|         | # 3242    |     |           |                       | BAAQMD      |            |            |
|         | Part 2    |     |           |                       | Condition # |            |            |
|         |           |     |           |                       | 3242 Part 4 |            |            |

Table VII - F
Applicable Limits and Compliance Monitoring Requirements
S22 - COLD CLEANER

|         | Emission  |     | Future    |                       | Monitoring  | Monitoring |            |
|---------|-----------|-----|-----------|-----------------------|-------------|------------|------------|
| Type of | Limit     | FE  | Effective |                       | Requirement | Frequency  | Monitoring |
| limit   | Citation  | Y/N | Date      | <b>Emission Limit</b> | Citation    | (P/C/N)    | Type       |
| VOC     | BAAQMD    | N   |           | Solvent < 15 gal/yr   | Regulation  | P/Q        | Records    |
|         | Condition |     |           |                       | 8-16-501;   |            |            |
|         | # 3242    |     |           |                       | BAAQMD      |            |            |
|         | Part 3    |     |           |                       | Condition # |            |            |
|         |           |     |           |                       | 3242 Part 4 |            |            |

Table VII - G
Applicable Limits and Compliance Monitoring Requirements
S25 - BOCS ADHESIVE APPLICATOR WITH OVEN

| Type of | Emission<br>Limit | FE  | Future<br>Effective |                      | Monitoring<br>Requirement | Monitoring<br>Frequency | Monitoring |
|---------|-------------------|-----|---------------------|----------------------|---------------------------|-------------------------|------------|
| • •     |                   |     |                     |                      | •                         | 1 1                     | Monitoring |
| limit   | Citation          | Y/N | Date                | Emission Limit       | Citation                  | (P/C/N)                 | Type       |
| VOC     | BAAQMD            | Y   |                     | Coating < 2.2 lb/gal | Regulation                | P/D                     | Records    |
|         | 8-12-301.1        |     |                     |                      | 8-12-501                  |                         |            |

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# VII. Applicable Emission Limits & Compliance Monitoring Requirements

Table VII - G
Applicable Limits and Compliance Monitoring Requirements
S25 - BOCS ADHESIVE APPLICATOR WITH OVEN

| Type of | Emission<br>Limit | FE  | Future<br>Effective |                              | Monitoring<br>Requirement | Monitoring<br>Frequency | Monitoring |
|---------|-------------------|-----|---------------------|------------------------------|---------------------------|-------------------------|------------|
| limit   | Citation          | Y/N | Date                | <b>Emission Limit</b>        | Citation                  | (P/C/N)                 | Type       |
| VOC     | BAAQMD            | N   |                     | Coatings $\leq 23,600$       | Regulation                | P/D                     | Records    |
|         | Condition #       |     |                     | gal/yr                       | 8-12-501;                 |                         |            |
|         | 15268             |     |                     | Cleanup Solvent = 0          | BAAQMD                    |                         |            |
|         | Part 1            |     |                     | gal/yr                       | Condition #               |                         |            |
|         |                   |     |                     |                              | 15268 Part 3              |                         |            |
|         | BAAQMD            | N   |                     | $POC \le 7001 \text{ lb/yr}$ | Regulation                | P/D                     | Records    |
|         | Condition #       |     |                     |                              | 8-12-501;                 |                         |            |
|         | 15268             |     |                     |                              | BAAQMD                    |                         |            |
|         | Part 2            |     |                     |                              | Condition #               |                         |            |
|         |                   |     |                     |                              | 15268 Part 3              |                         |            |

Table VII - H
Applicable Limits and Compliance Monitoring Requirements
S26 - COATER DRYER

| Type of | Emission<br>Limit | FE  | Future<br>Effective |                               | Monitoring<br>Requirement | Monitoring<br>Frequency | Monitoring |
|---------|-------------------|-----|---------------------|-------------------------------|---------------------------|-------------------------|------------|
| limit   | Citation          | Y/N | Date                | <b>Emission Limit</b>         | Citation                  | (P/C/N)                 | Type       |
| VOC     | BAAQMD            | Y   |                     | Coating < 2.2 lb/gal          | Regulation                | P/D                     | Records    |
|         | 8-12-301.1        |     |                     |                               | 8-12-501                  |                         |            |
|         | BAAQMD            | N   |                     | Coatings $\leq$ 27,331        | Regulation                | P/D                     | Records    |
|         | Condition         |     |                     | gal/yr                        | 8-12-501;                 |                         |            |
|         | #15437            |     |                     | Cleanup Solvent = 0           | BAAQMD                    |                         |            |
|         | Part 1            |     |                     | gal/yr                        | Condition                 |                         |            |
|         |                   |     |                     |                               | #15268 Part 3             |                         |            |
|         | BAAQMD            | N   |                     | $POC \le 6,833 \text{ lb/yr}$ | Regulation                | P/D                     | Records    |
|         | Condition         |     |                     |                               | 8-12-501;                 |                         |            |
|         | #15437            |     |                     |                               | BAAQMD                    |                         |            |
|         | Part 2            |     |                     |                               | Condition                 |                         |            |
|         |                   |     |                     |                               | #15268 Part 3             |                         |            |

# VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VI, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII Test Methods

| Applicable  |                               |   |
|-------------|-------------------------------|---|
| Requirement | Description of Requirement    | Acceptable Test Methods                               |
| BAAQMD      | Ringelmann No. 1 Limitation   | Manual of Procedures, Volume I, Evaluation of Visible |
| 6-301       |                               | Emissions   |
| BAAQMD      | Particulate Weight Limitation | Manual of Procedures, Volume IV, ST-15, Particulate   |
| 6-310       |                               | Sampling  |
| BAAQMD      | General Operations            | Manual of Procedures, Volume IV, ST-15, Particulate   |
| 6-311       |                               | Sampling  |
| BAAQMD      | Determination of Emissions    | Manual of Procedures, Volume IV, ST-7,                |
| Regulation  |                               | EPA Method 25 or 25A                                  |
| 8-4-302     |                               |   |
| BAAQMD      | Analysis of Samples           | Manual of Procedures, Volume III, Method 21,          |
| Regulation  |                               | Determination of Compliance of Volatile Organic       |
| 8-4-302     |                               | Compounds for Water Reducible Coatings or             |
|             |                               | Manual of Procedures, Volume III, Method 22,          |
|             |                               | Determination of Compliance of Volatile Organic       |
|             |                               | Compounds for Solvent Based Coatings                  |
| BAAQMD      | VOC Limits                    | Manual of Procedures, Volume III, Method 21,          |
| Regulation  |                               | Determination of Compliance of Volatile Organic       |
| 8-12-301.1  |                               | Compounds for Water Reducible Coatings or             |
|             |                               | Manual of Procedures, Volume III, Method 22,          |
|             |                               | Determination of Compliance of Volatile Organic       |
|             |                               | Compounds for Solvent Based Coatings                  |

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# IX. GLOSSARY

#### **BAAQMD**

Bay Area Air Quality Management District

#### **BACT**

Best Available Control Technology

#### CAA

The federal Clean Air Act

#### **CAAQS**

California Ambient Air Quality Standards

## CEQA

California Environmental Quality Act

#### **CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

#### CO

Carbon Monoxide

#### **Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

#### District

The Bay Area Air Quality Management District

#### EPA

The federal Environmental Protection Agency.

## **Excluded**

Not subject to any District Regulations.

## FE, Federally Enforceable

All limitations and conditions which are enforceable by the Administrator of the EPA including

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those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part

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52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

#### **HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

## **Major Facility**

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

#### MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

#### **MOP**

The District's Manual of Procedures.

#### **NAAQS**

National Ambient Air Quality Standards

#### **NESHAPs**

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

#### **NMHC**

Non-methane Hydrocarbons

#### **NOx**

Oxides of nitrogen.

#### **NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

#### **NSR**

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment".

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Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

#### **Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NOx, PM10, and SO2.

# **Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

#### **POC**

Precursor Organic Compounds

#### PM

Total Particulate Matter

#### PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

#### **PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

#### **SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

#### SO<sub>2</sub>

Sulfur dioxide

#### Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

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# IX. Glossary

# **TSP**

Total Suspended Particulate

# VOC

Volatile Organic Compounds

# **Units of Measure:**

| bhp   | = | brake-horsepower                 |
|-------|---|----------------------------------|
| btu   | = | British Thermal Unit             |
| g     | = | grams                            |
| gal   | = | gallon                           |
| hp    | = | horsepower                       |
| hr    | = | hour                             |
| lb    | = | pound                            |
| in    | = | inches                           |
| max   | = | maximum                          |
| $m^2$ | = | square meter                     |
| min   | = | minute                           |
| mm    | = | million                          |
| ppmv  | = | parts per million, by volume     |
| ppmw  | = | parts per million, by weight     |
| psia  | = | pounds per square inch, absolute |
| psig  | = | pounds per square inch, gauge    |
| scfm  | = | standard cubic feet per minute   |
| yr    | = | year                             |
|       |   |                                  |

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# X. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments